

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

MICHELLE BOURDELAIS,

Plaintiff,

v.

Civil Action No. 3:10-cv-670

**JPMORGAN CHASE BANK, NA,
and
CHASE HOME FINANCE, LLC,**

Defendants.

**FINAL AGREED MOTION FOR ENLARGEMENT OF TIME TO
RESPOND TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER
ON PRIVILEGED DOCUMENTS (Docket No. 74)**

COMES NOW Plaintiff, Michelle Bourdelais, by counsel, with the agreement and consent of Defendants, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC (collectively, "JPMorgan Chase"), by counsel, and pursuant to Fed. R. Civ. P. 6(b)(1)(A) and at the suggestion of counsel for the Defendants, she moves for leave to respond to Defendants' pending Motion for Protective Order on Privileged Documents from January 11, 2013 to January 24, 2013. This date is the date sought and agreed to by the parties for the enlargement of any discovery related Motions, it is also past the date of the scheduled settlement conference. The enlargement will permit the parties to continue their effort to complete what has become a possible complex settlement structure in this case.

Defendants have agreed and consented.

Respectfully submitted,

MICHELLE BOURDELAIS,

_____/s/_____
Leonard A. Bennett, Esq. VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
E-mail: lenbennett@clalegal.com

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of January 2013, I will file the foregoing Motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David Neal Anthony
Troutman Sanders LLP
Troutman Sanders Bldg
1001 Haxall Point
PO Box 1122
Richmond, VA 23219
Email: david.anthony@troutmansanders.com

Nancy Renee Thomas
Morrison & Foerster, LLP
555 West Fifth Street
Suite 3500
Los Angeles, CA 90013
E-mail: nthomas@mofo.com

_____/s/_____
LEONARD A. BENNETT, VSB#37523
CONSUMER LITIGATION ASSOCIATES, P.C.
Attorney for Plaintiff
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, Virginia 23601
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
Email: lenbennett@clalegal.com